



March 24, 2011

PROPOSITION 65 ENFORCEMENT REPORTING  
ATTENTION: PROP 65 COORDINATOR  
1515 CLAY STREET, SUITE 2000  
POST OFFICE BOX 70550  
OAKLAND, CA 94612-0550

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") give you notice that the Disney companies identified on the attached service list (collectively hereinafter "Disney") have been, are, will be and threaten to be in violation of Cal. Health & Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below listed address and telephone number, and I am a responsible individual at both Mateel and this office. The above referenced violations occur at Disneyland in Anaheim, California and at Disney's California Adventure also in Anaheim, and are caused by the brass stanchions and brass hand rails used in crowd/line control at those rides/exhibits/spectacles within Disneyland that are listed on the attached sheet. The exposures are caused by the Sword in the Stone Exhibit, which is also made of brass. The exact address and location of Disneyland is also provided on that same attached sheet. Patrons of Disneyland are exposed to lead when they touch the above-referenced brass stanchions and brass hand rails while gathered near or while waiting in line at the rides/exhibits/locations described in the attached sheet. They are also exposed to lead when they touch the Sword in the Stone exhibit. **The consumer service that causes the exposure is providing the rides/exhibits/spectacles that are listed in the attached sheet.** The brass alloy used to make the stanchions and hand rails used for crowd/line control at the rides/exhibits/spectacles on the attached sheet contain lead. The brass alloy used in the Sword in the Stone exhibit also contains lead. When people touch these brass stanchions, hand rails, and exhibits, lead from the brass alloy comes off on their hands and is then absorbed through the skin, enters the body through cuts and abrasions, is ingested orally by being transferred from hands to food which is then eaten, or by hand-to-mouth (or other mucous membranes) behavior such as nail biting, or lead is transferred from hands to cigarettes and then inhaled when the cigarette is smoked. These lead exposures thus occur via the dermal absorption, subcutaneous, mucus membrane, ingestion and inhalation routes. Disney did not and does not provide people with clear and reasonable warnings before it exposes them to lead. These violations have occurred every day since March 24, 2008, and will continue every day until the lead is removed from the alloys used to make stanchions and chains or until Disney provides its patrons with Proposition 65-compliant warnings. The above-referenced violations are alleged for occupational exposures as well as for consumer service exposures. The actions that Disney employees take that expose them to lead are the same as the actions taken by Disney patrons—they touch the brass alloy from which the brass stanchions, hand rails, and exhibits are made. This Notice of Violation pertains only to Proposition 65 violations that occur in the County of Orange.

Cordially,

  
William Verick

424 First Street, Eureka, CA 95501 • 707.268.8900 (phone) 707.268.8901 (fax)

## SERVICE LIST

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ATTENTION: PROP 65 COORDINATOR  
1515 CLAY STREET, SUITE 2000  
POST OFFICE BOX 70550  
OAKLAND, CA 94612-0550

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF ORANGE  
401 CIVIC CENTER DR WEST  
SANTA ANA, CA 92701-4515

DAVID K THOMPSON, CEO  
DISNEY INCORPORATED  
500 SOUTH BUENA VISTA STREET  
BURBANK, CA 91521-0001

DAVID K THOMPSON, CEO  
DISNEY WORLDWIDE SERVICES, INC.  
500 S BUENA VISTA ST  
BURBANK, CA 91521-0001

NICK FRANKLIN, CEO  
DISNEYLAND INTERNATIONAL  
500 S BUENA VISTA ST  
BURBANK, CA 91521-0001

ROBERT A IGER, CEO  
THE WALT DISNEY COMPANY  
500 S BUENA VISTA ST  
BURBANK, CA 91521-0001

ANDY BIRD, CEO  
WALT DISNEY INTERNATIONAL  
500 SOUTH BUENA VISTA ST  
BURBANK, CA 91521-0001

MEG CROFTON, CEO  
WALT DISNEY PARKS & RESORTS U.S., INC.  
1375 BUENA VISTA DR 4TH FL NORTH  
LAKE BUENA VISTA, FL 32830-8402



Address 1313 Disneyland Dr  
Anaheim, CA 92802

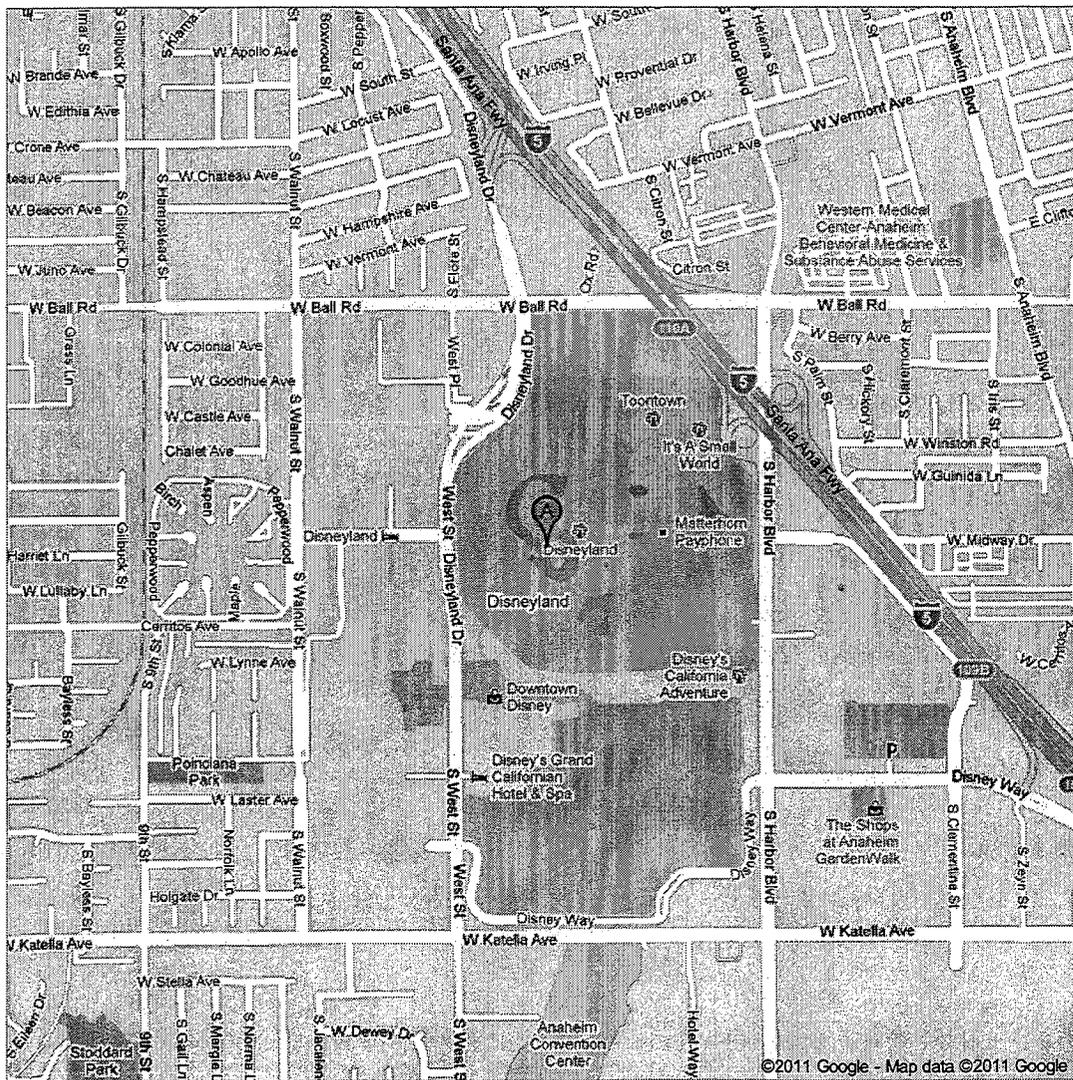
Notes BRASS STANCHIONS, BRASS RAILINGS, BRASS CHAINS LOCATED AT THE FOLLOWING DISNEYLAND LOCATIONS AND DISNEY'S CALIFORNIA ADVENTURE LOCATIONS:

DISNEYLAND:

- Snow White's Scary Adventures
- Peter Pan's Flight
- Story Book Land Canal Boats
- Mr Toad's Wild Ride
- Haunted Mansion
- Pirates of the Caribbean
- Sword in the Stone
- Gibson Girl Ice Cream Parlor
- Blue Ribbon Bakery
- City Hall

DISNEY'S CALIFORNIA ADVENTURE:

- Paradise Bay/Golden State Park Viewing Area for World of Color
- Toy Story Midway Mania
- Don Tomas "The Midway's Best Bites" Food Stand (Paradise Pier)
- Churros Food Stand (Paradise Pier)

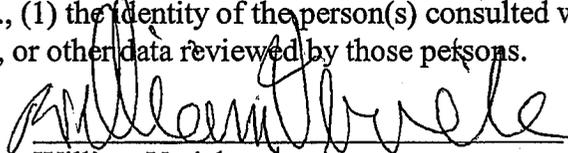


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**CERTIFICATE OF MERIT**

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached notice(s) of violation in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: March 24, 2011

  
William Verick

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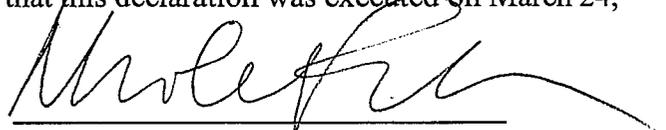
This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliances in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

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**CERTIFICATE OF SERVICE**

I, Nicole Frank, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 424 First Street, Eureka, California, 95501. On March 24, 2011, I caused the attached NOTICE OF VIOLATION LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached NOTICE OF VIOLATION and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on March 24, 2011, at Eureka, California.

  
Nicole Frank